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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

Thomas Kim,

Plaintiff,

v.

United States of America,

Defendant.

Case No. 2:16-cv-00778-APG-CWH

**DEFENDANT'S FIRST MOTION
FOR EXTENSION OF TIME TO ANSWER
PLAINTIFFS' AMENDED COMPLAINT**

CHANG AHN, *et al.*,

Plaintiff,

v.

United States of America,

Defendant.

Case No. 2:17-cv-00133-APG-CWH

Defendant respectfully requests that the Court extend by 30 days the time for Defendant to Answer Plaintiffs' Amended Complaint, which was filed on September 11, 2017. This is Defendant's first request for additional time to answer the Amended Complaint. With the extension, the answer will be due on October 25, 2017.

Plaintiffs' Amended Complaint raises new allegations and duties of care, as well as

1 identifying different agencies and employees who were purportedly negligent. This extension will
2 allow Defendant to coordinate with the Department of Justice as to the discretionary function
3 exception to the Federal Tort Claims Act. In addition, Defendant's counsel has upcoming work
4 travel scheduled as well as a number of upcoming dispositive motion deadlines. This extension is
5 not sought for the purposes of delay. Defendant has communicated with Plaintiffs' counsel, and
6 said counsel has no objections to this extension of time. A proposed Order is attached herewith.

7 Respectfully submitted this 18th day of September, 2017.

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9 JEFFERSON B. SESSIONS III
United States Attorney General
10 District of Arizona

11 s/ Katherine V. Foss
12 KATHERINE V. FOSS
13 J. COLE HERNANDEZ
Special Attorneys to the Attorney General

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15 **IT IS SO ORDERED:**

16 **Defendant's Motion for Extension of Time to Answer Plaintiff's Amended Complaint (Doc.**
17 **49) is hereby granted. Defendant's answer shall be due on or before October 25, 2017.**

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UNITED STATES MAGISTRATE JUDGE

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CERTIFICATE OF SERVICE

I hereby certify that on September 18, 2017, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

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s/ Pamela Vavra
Motion for Extension of Time to
Answer Plaintiffs' Amended Complaint